

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

RODNEY D. PIERCE and
MOSES MATTHEWS,

Plaintiffs,

v.

THE NORTH CAROLINA STATE BOARD
OF ELECTIONS, *et al.*,

Defendants.

Case No. 4:23-cv-193-D

JOINT NOTICE OF FILING SUPPLEMENTAL RPV REPORTS

Plaintiffs Rodney D. Pierce and Moses Matthews (“Plaintiffs”), together with Defendants the North Carolina State Board of Elections, Alan Hirsch, Jeff Carmon III, Stacy Eggers IV, Kevin N. Lewis, Siobhan O’Duffy Millen, each in their official capacities (“State Board Defendants”), and Philip E. Berger and Destin Hall, both in their official capacities (“Legislative Defendants”), pursuant to D.E. 113, notify the Court of their opening and rebuttal supplemental racially polarized voting (“RPV”) expert reports analyzing the November 2024 election results to the record in this matter as follows:

Legislative Defendants move the opening and rebuttal supplemental reports of Dr. John Alford, LD075 and LD076, for admission to the record as admitted exhibits. Stamped copies of LD075 and LD076 are attached hereto as **Attachment A**.

Plaintiffs do not object to the admission of Dr. Alford’s opening supplemental report, LD075. Plaintiffs object to the admission of certain portions of Dr. Alford’s supplemental rebuttal report, LD076, as improper supplementation and improper rebuttal. Plaintiffs will file a brief

setting forth their objections to LD076 within 14 days. Legislative Defendants will file any response to Plaintiffs' objections within 14 days, and Plaintiffs shall have 7 days to file any reply.

Plaintiffs move the opening and rebuttal supplemental reports of Dr. Loren Collingwood, PX279 and PX280, for admission to the record as admitted exhibits. Stamped copies of PX279 and PX280 are attached hereto as **Attachment B**. Legislative Defendants do not object to the admission of PX279 or PX280.

State Board Defendants do not submit any supplemental RPV reports.

Respectfully submitted, this the 10th day of March, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel and parties registered in said system.

Respectfully submitted this, the 10th day of March, 2025.

/s/ Orion de Nevers
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